

LOCKE LORD LLP

Andrew Braunstein
Jonathan W. Young
Hanna J. Redd
Brookfield Place
200 Vesey Street, 20th Floor
New York, NY 10281
Tel: 212-415-8600
andrew.braunstein@lockelord.com
jonathan.young@lockelord.com
hanna.redd@lockelord.com

Counsel to Commission Junction LLC

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

BED BATH & BEYOND, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-13359 (VFP)

Jointly Administered

APPLICATION FOR PRO HAC VICE ADMISSION OF JONATHAN W. YOUNG

The undersigned hereby seeks and Order granting the admission *pro hac vice* of Jonathan W. Young of the law firm Locke Lord LLP to practice before this Court in connection with the above-captioned proceeding. This application (the “*Application*”) is submitted pursuant to rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey. Unless requested by other parties, no oral argument is requested. A proposed form of Order is attached. In support of the Application, the undersigned hereby represents as follows:

¹ The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these Chapter 11 Cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 650 Liberty Avenue, Union, New Jersey 07083.

1. I am an attorney at Locke Lord LLP (“*Locke*”) which maintains an office at Brookfield Place, 200 Vesey St., New York, NY 10281. Locke has been retained to serve as counsel for Commission Junction in connection with the above-captioned bankruptcy case.

2. I am an attorney admitted to practice in the State of New Jersey, and admitted to practice before the United States District Courts for New Jersey.

3. I submit this Application, pursuant to Civ. Rule 101.1(c) of the Local Rules of the United States District Court for the District of New Jersey, and Rule 9010-1 of the Local Rules of the Bankruptcy Practice for the United States Bankruptcy Court for the District of New Jersey, in support of an Order Approving Admission, *Pro Hac Vice*, of Jonathan W. Young, Esq.

4. Mr. Young is an attorney with Locke, which maintains an address of 701 8th Street, N.W., Suite 500, Washington, D.C. 20001.

5. Attached hereto as **Exhibit A** is a certification of Mr. Young in which he certifies that he is, and has been, a member in good standing of the bar of Illinois since 1990, and is admitted to practice in the Commonwealth of Massachusetts, the Supreme Court of the United States, the United States Court of Appeals for the First, Second, Third, Sixth, Seventh and Eighth Circuits and the United States District Court for the Northern and Central Districts of Illinois, the North District of Indiana, the District of Massachusetts and the Eastern and Western Districts of Wisconsin. Additionally, Mr. Young certifies that he is, and has remained, a member in good standing of said bar at all times, that no disciplinary proceedings are pending against him in any jurisdiction and no discipline has previously been imposed on him in any jurisdiction.

6. Mr. Young is familiar with the circumstances surrounding the above-captioned proceeding and applicable law, and his presence will serve the best interests of Commission Junction.

7. Mr. Young is familiar with the Local Rules of practice of this Court.

WHEREFORE, the undersigned respectfully requests entry of the Order submitted herewith approving the admission, *pro hac vice*, of Jonathan W. Young, Esq. to represent Commission Junction as counsel in connection with the above-captioned case.

Dated: April 28, 2023

Respectfully submitted,

/s/ Andrew Braunstein

Andrew Braunstein
Brookfield Place
200 Vesey Street, 20th Floor
New York, NY 10281
Tel: 212-415-8600
andrew.braunstein@lockelord.com

Exhibit A

LOCKE LORD LLP

Andrew Braunstein
Jonathan W. Young
Hanna J. Redd
Brookfield Place
200 Vesey Street, 20th Floor
New York, NY 10281
Tel: 212-415-8600
andrew.braunstein@lockelord.com
jonathan.young@lockelord.com
hanna.redd@lockelord.com

Counsel to Commission Junction LLC

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

BED BATH & BEYOND, INC., *et al.*,²

Debtors.

Chapter 11

Case No. 23-13359 (VFP)

Jointly Administered

**CERTIFICATION OF JONATHAN W. YOUNG IN SUPPORT OF
APPLICATION FOR *PRO HAC VICE* ADMISSION**

I, Jonathan W. Young, certify pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner with the law firm Locke Lord LLP (“***Locke***”), which maintains an address of 701 8th Street, N.W., Suite 500, Washington, D.C. 20001.

2. I make this certification in support of my application (the “***Application***”) pursuant to rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the “***Local Rules***”), for admission to the Bankruptcy Court *pro hac vice*. Locke has been

² The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these Chapter 11 Cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 650 Liberty Avenue, Union, New Jersey 07083.

retained to serve as counsel to Commission Junction LLC (“*Commission Junction*”) in connection with the above-captioned cases.

3. I am and have been a member in good standing of the bar of Illinois since 1990, and am admitted to practice in the Commonwealth of Massachusetts, the Supreme Court of the United States, the United States Court of Appeals for the First, Second, Third, Sixth, Seventh and Eighth Circuits and the United States District Court for the Northern and Central Districts of Illinois, the North District of Indiana, the District of Massachusetts and the Eastern and Western Districts of Wisconsin.

4. I am, and have remained, a member in good standing of the bar at all times. No disciplinary proceedings are pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

5. I am familiar with the circumstances surrounding the above-captioned bankruptcy cases and applicable law, and my presence will serve the best interests of Commission Junction.

6. I am not admitted to practice law in the State of New Jersey and therefore believe it is necessary for me to see *pro hac vice* admission in this proceeding.

7. I have never been denied admission or disciplined in accordance with the Local Rules, nor have I been denied admission to any other Court.

8. I am in possession of and have reviewed a copy of the Local Rules of this Court.

9. If admitted *pro hac vice*, I agree to abide by the Local Bankruptcy Rules, and to make the payments to the Clerk of the United States Court for the District of New Jersey and the New Jersey Lawyer’s Fund for Client Protection as provided in Rule 101.1 of the Local Rules of the United States District Court for the District of New Jersey.

I certify under the penalty of perjury that the foregoing is true and correct.

Dated: April 28, 2023

/s/ Jonathan W. Young
Jonathan W. Young

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

LOCKE LORD LLP
Andrew Braunstein
Jonathan W. Young
Hanna J. Redd
Brookfield Place
200 Vesey Street, 20th Floor
New York, NY 10281
Tel: 212-415-8600
andrew.braunstein@lockelord.com
jonathan.young@lockelord.com
hanna.redd@lockelord.com
Counsel to Commission Junction LLC

In Re:
BED BATH & BEYOND, INC., et al.,

Debtors.

Case No.: 23-13359
Adv. No.:
Chapter: 11
Judge: Vincent F. Papalia

ORDER FOR ADMISSION PRO HAC VICE

The relief set forth on the following page is **ORDERED**.

This matter having been brought before the Court on application for an Order For Admission Pro Hac Vice; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc.78, D.N.J. L.Civ.R.101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that Jonathan W. Young be permitted to appear pro hac vice; provided that pursuant to D.N.J. L.Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$150.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for pro hac vice admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:

United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, N.J. 07102
Attention: Pro Hac Vice Admissions

and it is further ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.

rev. 8/1/15